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March 12, 2020

VIA ECF

Hon. Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

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MEMORANDUM ENDORSED

Re: **Pro Music Rights, LLC v. Google, LLC**
1:19-cv-11613-GHW (S.D.N.Y.)

Dear Judge Woods:

We represent Google LLC (“Google”) in the above-captioned action. Pursuant to Rule 1.E of Your Honor’s Individual Rules of Practice, we write jointly with counsel for Plaintiff Pro Music Rights (“PMR”) to respectfully request that: (i) Google’s time to respond to the operative Complaint be extended from March 23, 2020 to May 1, 2020, and (ii) the initial pretrial conference, presently scheduled for April 9, 2020, be adjourned until May 11, 2020, or as soon thereafter as the Court is available.

PMR consents to both requests. Neither Google nor PMR has previously requested an extension or adjournment of the above-mentioned deadlines, nor do these requested extensions and adjournments affect any other scheduled dates.

Good cause exists for these requested extensions, as set forth below. PMR filed this action on December 18, 2019. (ECF No. 1). That same day, PMR filed a virtually identical action against Google’s wholly owned subsidiary YouTube LLC, *Pro Music Rights, LLC v. YouTube, LLC*, 1:19-cv-11618-GBD (S.D.N.Y.) (the “YouTube Action”), which was assigned to the Honorable George B. Daniels.

On December 26, 2019, Your Honor scheduled an initial pretrial conference for April 9, 2020. (ECF No. 6). Google executed a waiver of service on January 30, 2020, which extended Google’s time to respond to the Complaint until March 23, 2020. (ECF No. 7). On February 25, 2020, Google filed a Related Case Statement in the YouTube Action pursuant to Rule 13(b)(3) of the Rules of the Division of Business Among District Judges for the Southern District of New York, and requested that Judge Daniels transfer the YouTube Action to Your Honor. That request is *sub judice*.

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On March 9, 2020, Google advised PMR that it intended to move to dismiss the operative Complaint for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6). In response, PMR indicated that it is contemplating an amendment to its Complaint, to address Google's anticipated motion and, potentially, avoid the need for motion practice directed at the pleadings.

Given the foregoing, the parties respectfully submit that it will be more efficient for the Court and the parties if the below-referenced deadlines are extended as follows:

Event	Current Date	Proposed Date
Google's time to respond to the operative Complaint	March 23, 2020	May 1, 2020
Joint letter and proposed Case Management Plan	April 2, 2020	May 4, 2020, or as determined by the Court
Initial pretrial conference	April 9, 2020	May 11, 2020, or as soon thereafter as the Court is available

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ A. John P. Mancini


A. John P. Mancini

cc: All Counsel of Record by ECF

Application denied.

SO ORDERED.

Dated: March 13, 2020
 New York, New York


 GREGORY H. WOODS
 United States District Judge